

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

RICARDO ESTRADA-TEPAL,
VICTOR LEONEL ESTRADA-TEPAL,
 also known as "Leonel,"
JORGE ESTRADA-TEPAL and
ARACELI NAVARRETE-CASTRO,
 also known as "Norma,"

Defendants.

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EASTERN DISTRICT OF NEW YORK, SS:

I, Christopher Davies, being first duly sworn, hereby
depose and state as follows:

In or about and between 2007 and the present, both
dates being approximate and inclusive, within the Eastern
District of New York and elsewhere, the defendants RICARDO
ESTRADA-TEPAL, VICTOR LEONEL ESTRADA-TEPAL, also known as
"Leonel," and JORGE ESTRADA-TEPAL, together with others, did
knowingly and intentionally recruit, entice, harbor, transport,
provide, obtain and maintain by any means a person in and
affecting commerce, knowing and in reckless disregard of the
fact that means of force, fraud and coercion, and a combination

of such means, would be used to cause the person to engage in a commercial sex act.

(Title 18, United States Code, Sections 1591(a)(1) and 3551 et seq.)

In or about and between 2007 and the present, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants RICARDO ESTRADA-TEPAL, VICTOR LEONEL ESTRADA-TEPAL, also known as "Leonel," JORGE ESTRADA-TEPAL and ARACELI NAVARRETE-CASTRO, also known as "Norma," together with others, knowing and in reckless disregard of the fact that one or more aliens had come to, entered and remained in the United States in violation of law, did knowingly and intentionally conspire to transport and move such aliens within the United States by means of transportation and otherwise, in furtherance of such violation of law, contrary to Title 8, United States Code, Section 1324(a)(1)(A)(ii).

(Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I) and 1324(a)(1)(B)(i); Title 18, United States Code, Sections 3551 et seq.)

The source of your deponent's information and the grounds for his belief are as follows:¹

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. I have been a Special Agent with the Department of Homeland Security, Homeland Security Investigations ("HSI") for approximately six years. I am responsible for conducting and assisting in investigations into the activities of individuals and criminal groups responsible for transnational sex and human trafficking and related offenses. In that capacity, I have participated in investigations involving the debriefing of sex trafficking victims, review of telephone records and GPS data, review of money transfer records, surveillance, analysis of pen register information, and various other techniques. As a result of my training and experience, I am familiar with the techniques and methods of operation used by individuals involved in criminal activity to conceal their activities from detection by law enforcement authorities.

2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. Because the purpose of this affidavit is limited to demonstrating probable cause for the defendants' arrest, it does not set forth all of my knowledge about this matter. In addition, when I rely on statements made by others, such statements are set forth only in part and in substance unless otherwise indicated.

A. Background

3. Starting in approximately March 2013, HSI has been investigating the sex trafficking activities of a group of individuals who are Mexican nationals, many of whom are members of an extended family known as the Estrada-Tepal trafficking organization (the "Estrada-Tepal Trafficking Organization").

4. As part of the investigation, HSI has interviewed a victim of the Estrada-Tepal Trafficking Organization ("Victim #1").² Specifically, in or about and between March 2013 and January 2014, HSI interviewed Victim #1, who described the methods and participants in the Estrada-Tepal Trafficking Organization. In summary, the Estrada-Tepal Trafficking Organization has engaged in transporting women to the United States to work in prostitution and the use of physical violence and threats to force the women to work in prostitution. Based on the investigation to date, HSI has determined that members of the Estrada-Tepal organization have operated out of one or more locations in Queens, New York.

5. As to the methods employed by the group, Victim #1 described, in substance and in part, how she met RICARDO ESTRADA-TEPAL in Mexico, where they started dating. Shortly thereafter, she moved in with RICARDO ESTRADA-TEPAL at his

² HSI has made a successful application to adjust Victim #1's immigration status to continued presence, and provided her with work authorization.

residence in Puebla, Mexico. Approximately four or five days after Victim #1 moved in with RICARDO ESTRADA-TEPAL, he told her that they were going to travel to the United States to work. Victim #1 further stated, in part, that RICARDO ESTRADA-TEPAL smuggled Victim #1 across the Mexico-U.S. border, by having smugglers hide Victim #1 on a train. After she arrived in the United States, Victim #1 traveled to New Jersey, where she³ was met by RICARDO ESTRADA-TEPAL's brother LEONEL.⁴ LEONEL drove Victim #1 to a residence in Queens, New York. Victim #1 believes that she arrived at the residence on or about August 9, 2011. Shortly after arriving in New York, LEONEL pressured Victim #1 to pay a debt resulting from her being smuggled in to the United States. Victim #1 contacted her uncle, who lived in Texas, and borrowed \$1,000, and she also contacted a friend in Indiana from whom she borrowed another \$1,000. LEONEL then told her, in substance, that she would have to work as a prostitute to pay the smuggling debt. When Victim #1 told RICARDO, by telephone, what LEONEL had told her, RICARDO told Victim #1, in

³ Victim #1 advised that she had learned that RICARDO's group had been arrested when attempting to cross the U.S.-Mexico border, and that RICARDO had been returned to Mexico.

⁴ HSI's investigation to date, including wire transfer records that reflect the name Victor Leonel Estrada-Tepal, has revealed that the individual Victim #1 referred to as "Leonel" is also known as Victor Leonel Estrada-Tepal. As discussed below, Victor Leonel Estrada-Tepal is believed to be the user of the 8637 Telephone.

substance, to do what his brother told her to do. RICARDO also told her that she had to work and that if she did not, her family would pay the price. Victim #1 advised that LEONEL became very aggressive and often yelled at her and threatened to harm her family if she did not work. Feeling that she had no choice, Victim #1 agreed to work as a prostitute. A female named "Norma" who was living at the residence in Queens advised Victim #1 on how to work and how much to charge.⁵

6. Victim #1 stated that the first day she worked, she only had two clients because she was bleeding vaginally. Despite the medical problem, Norma and LEONEL told her that she would have to return to work the next day. By the third day, Victim #1 did not see any customers because of her bleeding. She was then taken to the hospital and it was determined that she had an infection, making her unable to work for a week. After her recovery from the infection, she worked in prostitution with different drivers, who would drive her to meet prostitution clients. Victim #1 initially gave the money she earned from prostitution to LEONEL. After a period of time,

⁵ "Norma" has since been identified as the defendant ARACELI NAVARETTE-CASTRO. On January 30, 2014, NAVARRETE-CASTRO acknowledged to agents that her nickname is "Norma," and that she was the user of a cellular telephone bearing number 347-824-5353. Telephone number 347-824-5353 is subscribed to a "Norma Barrete," and has been used as a contact number for approximately 10 wire transfers sent via Western Union and Mateo, between December 6, 2012 and January 16, 2014, by an individual using the name "Norma Navarette-Castro."

RICARDO instructed her to send him all of the money she earned, which Victim #1 did, via Western Union. During this time, Victim #1 often spoke to RICARDO and told him that she did not want to work in prostitution, to which RICARDO responded that she had to work because he borrowed the money to smuggle her into the United States.

7. RICARDO later arrived in the United States, and by that time, Victim #1 despised him for what he had done to her. Victim #1 stated that RICARDO realized that something was wrong and attempted to convince her that everything was okay. When Victim #1 resisted his advances, he forcibly raped her. After RICARDO arrived in the United States, Victim #1 gave him the money that she earned as a prostitute every night when she returned home.

8. In October 2011, Victim #1 decided to run away. She left the Queens residence and escaped. After she ran away, RICARDO called Victim #1 and told her that if she did not return, something was going to happen to her or her family.

9. Victim #1 also stated that JORGE, RICARDO's brother, had a woman who worked for him as a prostitute ("Victim #2"). Victim #1 understood that Victim #2 sent the money that she earned in prostitution to JORGE in Mexico; after JORGE arrived in the United States, Victim #2 gave the money that she earned directly to JORGE. In addition, Victim #2 told Victim

#1, in substance, that JORGE beat her on two occasions because Victim #2 did not want to work as a prostitute.

10. Based on analysis of telephone records and other evidence, on January 23, 2014, HSI applied for and was granted authorization to collect cellular location data for a telephone that agents believed was being used by Victim #2. Victim #2 was subsequently located as a result, and provided the following information to HSI, in substance and in part.⁶

11. Victim #2 met JORGE ESTRADA-TEPAL in Mexico, where they began dating. Shortly after, JORGE ESTRADA-TEPAL suggested that they go to the United States so that they could make money to buy a home and to support her two children in Mexico. Victim #2 stated that JORGE paid a fee to have her smuggled across the Mexico-United States border. After entering the United States, Victim #2 initially lived with JORGE at an address in Queens, New York.

12. After her arrival in the United States, JORGE ESTRADA-TEPAL pressured Victim #2 to take a job at a bar, which she did. Victim #2 stated that JORGE took all of the money she earned from that job each day. After several days of working at the bar, JORGE told Victim #2 that she would have to work as a prostitute. JORGE ESTRADA-TEPAL told Victim #2 that drivers

⁶ HSI has offered to adjust Victim #2's immigration status to continued presence, and to provide her with work authorization.

would transport her to the locations of various prostitution clients. Victim #2 told JORGE that she did not want to work as a prostitute. He responded that she had no choice. Victim #2 ultimately began to work as a prostitute because she believed she had no other option. JORGE ESTRADA-TEPAL gave Victim #2 a phone number which she would call and an unknown male would then make arrangements for her to have sex with prostitution clients.

13. Victim #2 worked as a prostitute for approximately four years. During that period, JORGE ESTRADA-TEPAL would threaten her family if she did not continue to work. She was forced to work seven days a week, seeing multiple prostitution clients each day. In addition, Victim #2 gave JORGE ESTRADA-TEPAL the money she earned as a prostitute. On at least two occasions, JORGE ESTRADA-TEPAL physically assaulted Victim #2. She stated that she continued to work as a prostitute because she was afraid of him.

14. In addition, another female, Victim #3, has advised that after she was asked by a member of the Estrada-Tepal Trafficking Organization to travel to the United States for work, she worked in prostitution even though she did not want to. Victim #3 also stated, in substance, that her

trafficker and "Norma" gave her the first telephone numbers she was to use to contact drivers for the purpose of prostitution.⁷

B. Telephonic & Documentary Evidence

1. The 0375 Telephone

15. In 2013, Victim #1 advised HSI that Victim #2 told her that RICARDO's telephone number was 646-836-0375 ("the 0375 Telephone"). Records from Sprint confirm that the 0375 Telephone is subscribed to a Ricardo Estrada, at 8400 Roosevelt Avenue, Jackson Heights. Information from Sprint also indicates that service on the phone began in March 2012, and was still active as of January 13, 2014.

16. Telephone records obtained by HSI indicate that between July 1, 2012 and November 27, 2012, the 0375 Telephone was in contact with a telephone bearing number 718-288-5683 approximately 562 times.⁸ VICTOR LEONEL ESTRADA-TEPAL has listed 718-288-5683 as his contact telephone number for a Consolidated Edison account for a residence located at 35-23 92nd St.,

⁷ Based on my training and experience investigating sex trafficking cases, I am familiar with the manner in which sex trafficking operations move their victims by using drivers, who deliver the females to potential clients. These appointments are typically set up using telephones, and the drivers then transport the prostitutes to a location specified by client. In this manner, the members of the sex trafficking group are responsible for transporting the females (who are aliens) within the United States for the purpose of financial gain.

⁸ The summaries of the contact between the various telephones discussed herein include both calls and text messages sent between the telephones unless otherwise specified.

Apartment 2FT, Jackson Heights, New York 11372. Telephone records obtained by HSI also indicate that the 0375 Telephone was in contact with a telephone bearing number 718-840-8637 (the "8637 Telephone") approximately 926 times between December 1, 2012 and August 15, 2013. An individual using the names VICTOR LEONEL ESTRADA-TEPAL and Victor Estrada-Tepal has listed 718-840-8637 as his contact telephone number in connection with at least 50 wire transactions sent via Western Union to various individuals who also were party to wire transactions involving JORGE ESTRADA-TEPAL and RICARDO ESTRADA-TEPAL between April 10, 2013 and January 5, 2014, totaling approximately \$16,960. In addition, between July 1, 2012 and April 3, 2013, the 0375 Telephone was in contact with a telephone bearing number 347-773-9562 approximately 427 times. An individual using the name JORGE ESTRADA-TEPAL has listed 347-773-9562 as his contact telephone number in connection with approximately 144 wire transactions to individuals in Mexico, including but not limited to RICARDO ESTRADA-TEPAL and Juan Carlos Estrada-Tepal, sent via Western Union, between April 3, 2012 and January 4, 2014. Telephone records obtained by HSI further indicate that between August 12, 2012 and February 14, 2013, the 0375 Telephone was in contact with a telephone bearing the number 646-427-6119, which was subscribed to by an individual named Leonel Estrada. In addition, Ricardo Estrada listed 646-427-6119 as his contact

telephone number in connection with approximately 251 wire transactions sent via Western Union, totaling approximately \$28,544, to individuals in Mexico, between October 3, 2011 and November 11, 2013. Telephone records obtained by HSI also indicate that a telephone bearing number 347-279-5203, subscribed to Victor Estrada, was in contact with 21 phone numbers that were also in contact with the 0375 Telephone, including 718-288-5683, 646-427-6119 and 347-773-9562.

17. Analysis of money remitter transaction records demonstrates that Victim #1 sent two wire transmissions in September 2011 from Queens, New York, to RICARDO ESTRADA-TEPAL in Mexico. Also, other money remitter details show the transfer of money from the United States and Mexico by members of the Estrada-Tepal family. For example, RICARDO ESTRADA-TEPAL, using the number associated with the 0375 Telephone as a contact number, sent four wire transfers, on January 30, 2012, February 27, 2012, June 28, 2012 and July 18, 2012, totaling approximately \$3,746, via Ria, to various individuals in Tlaxcala and Puebla, Mexico. RICARDO ESTRADA-TEPAL, using the number associated with the 0375 Telephone as a contact number, also sent 25 wires transfers via Western Union to various individuals in Mexico between November 13, 2013 and January 3, 2014, totaling \$2,532. In addition, as noted above, RICARDO ESTRADA-TEPAL listed 646-427-6119 as a contact number in

connection with approximately 251 Western Union wire transfers to individuals in Mexico. Moreover, VICTOR LEONEL ESTRADA-TEPAL sent approximately 154 wire transfers totaling approximately \$70,287 between June 9, 2009 and February 20, 2013, via Ria to various individuals in Mexico, including but not limited to RICARDO ESTRADA-TEPAL and JORGE ESTRADA-TEPAL. An individual using the names VICTOR LEONEL ESTRADA-TEPAL and Victor Estrada-Tepal also sent approximately 350 wire transfers totaling approximately \$80,146 between August 31, 2009 and January 5, 2014, via Western Union to various individuals in Mexico, including but not limited to RICARDO ESTRADA-TEPAL, JORGE ESTRADA-TEPAL and Juan Carlos Estrada-Tepal. As noted above, Victor Estrada-Tepal and VICTOR LEONEL ESTRADA-TEPAL listed 718-840-8637 as the contact number in connection with wire transfers sent between April 10, 2013 and January 5, 2014. In addition, an individual using the name VICTOR LEONEL ESTRADA-TEPAL also sent approximately 41 wire transfers totaling approximately \$10,551 between May 25, 2009 and October 13, 2013, via Casa de Cambio to various individuals in Mexico, including but not limited to RICARDO ESTRADA-TEPAL and Juan Carlos Estrada-Tepal. Finally, an individual using the name JORGE ESTRADA-TEPAL sent approximately 117 wire transfers totaling approximately \$18,161 between January 14, 2008 and October 28, 2011 via Casa de Cambio to various individuals in Mexico. Based on my training and

experience in this and other investigations, it is common for managers of Mexico-based sex trafficking organizations to send proceeds from their prostitution enterprise to other participants in the organization, who are based in Mexico.

18. On August 23, 2013, the government applied for and obtained a warrant to obtain location information for the 0375 Telephone from United States Magistrate Judge Vera M. Scanlon (the "First Period of Authorization"). See Misc. No. 13-691. During the First Period of Authorization, HSI gathered location information regarding the 0375 Telephone that has proved to be relevant to the ongoing investigation into the Estrada-Tepal Trafficking Organization. For example, HSI has used the information to assist in conducting surveillance and has identified locations being frequented by the user of the 0375 Telephone. Notably, as a result of the cellular location information, agents were able to capture a photograph of a Hispanic male leaving 104-47 38th Avenue in Corona, New York, on or about September 16, 2013; Victim #1 has since identified the male in the photograph as RICARDO. In addition, the location information showed the 0375 Telephone in the vicinity of the 104-47 38th Avenue location, which address has been associated with JORGE ESTRADA-TEPAL, who has been identified as a participant in the criminal activities of the Estrada-Tepal Trafficking Organization, as discussed above. More

specifically, an individual using the names JORGE ESTRADA-TEPAL and Jorge Estrada listed 104-47 38th Avenue, Corona, NY 11368 as his address in connection with approximately 97 wire transactions sent via Western Union to Mexico between April 12, 2012 and January 4, 2014. The location information also revealed that the 0375 Telephone was frequently transported from 104-47 38th Avenue, Corona, NY 11368 to the area in and around 9th Avenue and West 50th and West 51st Streets in Manhattan, among other locations, during daytime hours during the First Authorization Period, and frequently transported back to 104-47 38th Avenue location in the late evening hours.

19. Thereafter, on September 20, 2013, the government reapplied for and obtained another warrant to obtain location information for the 0375 Telephone from United States Magistrate Judge Joan M. Azrack (the "Second Period of Authorization"). During the Second Period of Authorization, agents continued to collect cellular location information for the 0375 Telephone that has proven to be relevant to the ongoing investigation, and used such information to conduct surveillance. As a result of the surveillance, HSI was able to request additional wire transaction records related to an address where the 0375 Telephone was frequently located. The Second Period of Authorization expired on or about October 20, 2013. On November 19, 2013, United States Magistrate Judge Robert M. Levy issued

an order authorizing the delayed notification to any user of the 0375 Telephone, including Ricardo Estrada, for 90 days or until further order of the Court.

20. Most recently, between November 13, 2013 and January 3, 2014, an individual using the name RICARDO ESTRADA-TEPAL used the number as a contact number on approximately 25 wire transfers to individuals in Mexico, totaling approximately \$2,532. As discussed above, an individual using the name RICARDO ESTRADA-TEPAL has also sent numerous additional wires, using both the 0375 Telephone and another telephone number as contact numbers; between approximately October 3, 2011 and January 3, 2014, an individual using the names RICARDO ESTRADA-TEPAL and Ricardo Estrada sent approximately 276 Western Union wire transfers totaling approximately \$31,077.

21. In addition, the 0375 Telephone has been in frequent contact with several other numbers as to which there is probable cause to conclude that the telephones are being used in connection with sex trafficking activity, based on the information provided by Victim #1, calling activity, and experience investigating sex trafficking cases. For example, between August 1, 2013 and January 5, 2014, the 0375 Telephone has been in contact with the 8637 Telephone associated with VICTOR LEONEL ESTRADA-TEPAL approximately 971 times, with the most recent contact on January 5, 2014. In addition, between

September 28, 2013 and January 12, 2014, the 0375 Telephone has been in contact approximately 279 times with a telephone bearing number 929-421-8525 ("the 8525 Telephone"), which is associated with Jorge Estrada as discussed below.

2. The 8637 Telephone

22. As set forth above, the 8637 Telephone associated with defendant VICTOR ESTRADA-TEPAL has recently been in frequent contact with the 0375 Telephone being used by RICARDO ESTRADA-TEPAL. In addition, between September 28, 2013 and January 12, 2014, the 8637 Telephone was in contact with the 8525 Telephone associated with Jorge Estrada approximately 422 times, with the most recent contact on January 12, 2014. The 8637 Telephone has also been in frequent contact with a telephone assigned number 347-824-5353 ("the 5353 Telephone"), which is associated with defendant ARACELI NAVARRETE-CASTRO;⁹ between August 1, 2013 and January 12, 2014, the 8637 Telephone and the 5353 Telephone were in contact approximately 7,149 times, with the most recent contact on January 12, 2014. As another example, between September 7, 2013, and January 1, 2014, the 8637 Telephone was in contact with the 9069 Telephone approximately 58 times. In addition, between April 10, 2013 and

⁹ As set forth above, Victim #1 has advised that "Norma" (who the agents have since identified as defendant ARACELI NAVARRETE-CASTRO) was one of the individuals who told Victim #1 that she needed to work in prostitution, and gave Victim #1 information on how she should do the work, and how much to charge.

January 5, 2014, an individual using the names Victor Estrada-Tepal or VICTOR LEONEL ESTRADA-TEPAL listed the 8637 Telephone as the contact number on approximately 50 wire transfers sent via Western Union to individuals in Mexico, totaling approximately \$16,960.

3. The 8525 Telephone

23. As detailed above, the 8525 Telephone is subscribed to by "Jorge Estrada"; Victim #1 described "Jorge" as one of the brothers who was requiring Victim #2 to work in prostitution. Victim #2 also stated that she worked as a prostitute for Jorge for approximately four years. Also, as set forth above, the 8525 Telephone has been in frequent and recent contact with the 0375 Telephone being used by RICARDO ESTRADA-TEPAL and the 8637 Telephone being used by VICTOR LEONEL ESTRADA-TEPAL. In addition, the 8525 Telephone was recently used as a point of contact on approximately 15 wire transfers sent via Western Union by an individual using the name JORGE ESTRADA TEPAL and listing Queens, New York, as an address; these wires were sent between October 5, 2013 and November 23, 2013, to individuals in Mexico.

24. On January 23, 2014, the government applied for and received authorization to collect the location data associated with the 0375 Telephone, the 8637 Telephone, the 8525 Telephone, and the 5353 Telephone, among other phones. Using


that information and surveillance, HSI was able to locate defendants RICARDO ESTRADA-TEPAL, VICTOR LEONEL ESTRADA-TEPAL, JORGE ESTRADA-TEPAL and ARACELI NAVARRETE-CASTRO.

25. On January 30, 2014, HSI agents administratively arrested the defendants RICARDO ESTRADA-TEPAL, VICTOR LEONEL ESTRADA-TEPAL, JORGE ESTRADA-TEPAL and ARACELI NAVARRETE-CASTRO based on their illegal immigration status, at locations at Mount Vernon and Queens, New York. Following their arrests, the defendants made the following statements to HSI, in substance and in part. Following his arrest, JORGE ESTRADA-TEPAL admitted that he arranged for Victim #2, RICARDO ESTRADA-TEPAL, VICTOR LEONEL ESTRADA-TEPAL, and others to be smuggled into the United States. RICARDO ESTRADA-TEPAL admitted that he paid approximately \$5,500 to have another female ("Victim #3") smuggled to the United States, and after her arrival, she engaged in prostitution.

26. After her arrest, defendant ARACELI NAVARRETE-CASTRO, also known as "Norma," stated, in substance and in part, that she came to the United States in 2009 and that after her arrival, she worked in prostitution.

WHEREFORE, your deponent respectfully requests that the defendants RICARDO ESTRADA-TEPAL, VICTOR LEONEL ESTRADA-TEPAL, JORGE ESTRADA-TEPAL and ARACELI NAVARRETE-CASTRO be dealt with according to law.

Dated: Brooklyn, New York
January 31, 2014



Christopher Davies,
Special Agent,
Department of Homeland Security
Homeland Security Investigations

Sworn to before me this
31st day of January 2014
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